

Cellino & Barnes p.c.

ATTORNEYS AT LAW

The Graybar Building, 420 Lexington Avenue, Suite 2140
New York, New York 10170

Tel: (800) 888-8888

Fax: (877) 227-8020

www.CellinoandBarnes.com

Stephen E. Barnes
 Ross M. Cellino
 Daniel W. Aiello
 Richard P. Amico
 Richard J. Barnes
 Denis J. Bastible
 Kathleen E. Beatty
 Alex Bouganin
 Dylan J. Brennan
 Daniel J. Caffrey
 Joseph J. Capetola
 Scott D. Carlton
 Stephen C. Ciocca
 Robert J. Cipitelli
 Thomas P. Cleere
 Michael J. Cooper
 Christopher D. D'Amato
 Aybike Donuk
 Sandy A. Fazili
 Jordan S. Finkelstein
 Steven M. Fleckner
 Brian A. Goldstein, M.D., J.D.
 Igor Grichanik
 George R. Gridelli
 Timothy R. Hedges

Special Counsel:
 John E. Lavelle
 Gregory V. Pajak
 Ellen B. Sturm

Mark B. Hudoba
 Lisa F. King
 Patrick A. Little
 John W. Looney
 Michael J. Lovocchio
 William J. Loyd
 Brett L. Manske
 John C. Murrett, Jr.
 Michael P. Napolitano
 Joshua C. Olmstead
 Alexander Paine
 Robert J. Peragine
 Joshua B. Sandberg
 Sean L. Sasso
 Robert J. Schreck
 Robert Seigal
 John H. Shields
 David E. Silverman
 Allan M. Silverstein
 Erica B. Tannenbaum
 Princess M. Tate-Burris
 Christopher J. Trochiano
 Joe A. Vazquez
 Robert L. Voltz
 Michael J. Williams
 K. John Wright
 David C. Zimmerman

July 2, 2020

VIA ECF

Honorable Vernon S. Broderick, United States District Judge
 United States District Court
 Southern District of New York
 Thurgood Marshall United States Courthouse
 40 Foley Square, Room 415
 New York, New York 10007

APPLICATION GRANTED
 SO ORDERED *Ver Bla*
 VERNON S. BRODERICK
 U.S.D.J. 7/7/2020

Re: Request for Adjournment
Clarke v. Marketaxess Corporation et al.
 Docket No.: 1:19-cv-06471

The deadline to file a joint letter and proposed case management plan is adjourned sine die.

Dear Judge Broderick:

The undersigned represents the plaintiff in the above-captioned matter. The undersigned has conferred with the attorneys for all parties to this action except for MSDI LLC, FAST FLEET JFK, individually and doing business as FAST FLEET SYSTEMS, INC., WARREN BAINBRIDGE, and NICA, INC. The reason is no answer, appearance, motion, or communication has been received on behalf of MSDI LLC, FAST FLEET JFK, individually and doing business as FAST FLEET SYSTEMS, INC., WARREN BAINBRIDGE, or NICA, INC. Written notice of their default will be transmitted shortly.

All counsel who are involved in the case at this time respectfully submit this joint request for an adjournment of the July 2, 2020 deadline for the submission of the letter, case management plan, and scheduling order.

Counsel for SMOOTH OPERATORS SERVICES LLC, individually and doing business as FAST FLEET – JFK has agreed to extend the time to oppose its pending motion to dismiss to July 27, 2020.

Counsel for FISHER-PARK LANE OWNER LLC and FISHER BROTHERS MANAGEMENT CO. LLC has requested an extension of time to answer to July 27, 2020.

In order to allow reasonable time (a.) to address the default of MSDI LLC, FAST FLEET JFK, individually and doing business as FAST FLEET SYSTEMS, INC., WARREN BAINBRIDGE, and NICA, INC., (b.) for briefing and submission of the motion, and (c) for inclusion of counsel for any other answering parties, we request that the deadline be extended to September 29, 2020. There are no other scheduled dates that will be affected. The initial pretrial conference was discontinued by order dated April 29, 2020, in light of the public health crisis.

We thank the court for its consideration of these issues and our request.

Very truly yours,

A handwritten signature in black ink, appearing to be 'K. Beatty', with a large, sweeping flourish extending from the bottom right.

Kathleen E. Beatty
(212) 804-7400 x541

KEB:keb